

Curling, Donna v. Raffensperger, Brad

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

DONNA CURLING, et al., )  
)  
Plaintiff, )  
) CIVIL ACTION FILE  
vs. )  
) NO. 1:17-cv-2989-AT  
BRAD RAFFENSBERGER, et al., )  
)  
Defendant. )

The remote videoconference deposition of LAURA MARIE DIGGES, taken pursuant to the stipulations contained herein; the reading and signing of the deposition reserved, before Charlene M. Hansard, B-2341, Certified Court Reporter, commencing at 1:28 p.m., on Thursday, September 23, 2021, with witness located in Marietta, Georgia 30066.

## A P P E A R A N C E S

(All parties appeared remotely by Zoom  
videoconference.)

## ON BEHALF OF PLAINTIFF CURLING:

Hannah Elson, Esq.  
Morrison & Foerster, LLP  
2100 L Street, Suite 900  
Washington, D.C. 20037  
(202) 926-6976  
Helson@mofo.com

## ON BEHALF OF PLAINTIFFS DIGGES AND MISSETT:

Cary Ichter, Esq.  
Ichter Davis, LLC  
3340 Peachtree Road, N.E.  
Suite 1530  
Atlanta, Georgia 30326  
(404) 869-7600  
Cichter@ichterdavis.com

## ON BEHALF OF STATE DEFENDANTS:

Bryan Jacoutot, Esq.  
R. Dal Burton, Esq.  
Taylor English Duma, LLP  
1600 Parkwood Circle  
Suite 400  
Atlanta, Georgia 30339  
(770) 434-6868  
Bjacoutot@taylorenghish.com  
dburton@taylorenghish.com

A P P E A R A N C E S  
(continued)

ON BEHALF OF FULTON COUNTY DEFENDANTS:

Cheryl Ringer, Esq.  
Office of the County Attorney  
Fulton County  
141 Pryor Street, SW, Suite 4038  
Atlanta, Georgia 30303  
(404) 612-0286  
Cheryl.ringer@fultoncountyga.gov

ALSO PRESENT:

Ms. Marilyn Marks, Executive Director  
Coalition for Good Governance

Mr. Matthew Riesdorff, Veritext Concierge Tech

Legend of the Transcript:

(sic)	Exactly as said
(phonetic)	Exact spelling unknown
. . .	Trailing off or did not complete thought
--	Break in speech continuity
uh-huh	Affirmative
uh-uh	Negative

I N D E X

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LAURA MARIE DIGGES	
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DEFENDANT'S EXHIBITS

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and Coalition Plaintiffs'

Objections and Responses to

Defendant Brad Raffensperger's

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(Originally marked exhibits attached to the  
original of the deposition and a copy attached  
to all copies produced.)

1 (Exhibit No. 1, Notice of Deposition, was  
2 marked for identification purposes.)

3 BY MR. JACOUTOT:

4 Q. Okay. I'm going to share with you what's  
5 been marked Exhibit No. 1. And let me know when it  
6 shows up on your -- in your Exhibit Share. You might  
7 have to refresh. Is it there? It should be Exhibit  
8 0001.

9 A. Okay. There it is.

10 Q. Okay. So that is -- Can you confirm for me  
11 that that is the Notice of Deposition that you  
12 received?

13 A. Yes, it looks like it. Yeah. Yes.

14 Q. Okay. Great. I don't have any questions on  
15 that. I just wanted to go ahead and put it in the  
16 record for us.

17 A. All right.

18 Q. Can you give me your current address?

19 A. 3478 Chastain, C-h-a-s-t-a-i-n, Lynn Lane,  
20 Northeast, Marietta, Georgia 30066.

21 Q. Okay. Thank you. And how long have you  
22 lived in Cobb County?

23 A. 1996.

24 Q. Now, I know you said you've never had a  
25 deposition before. But have you ever been examined at

1       certifications. They had their own internal education  
2       and I received a few certifications from them --  
3       through them.

4           Q.     Okay. Any other type of education that you  
5       can name?

6           A.     No.

7           Q.     Okay. So do you have any education in  
8       election law or voting specifically?

9           A.     Education in voting law or -- Well, I -- I  
10       was a poll watcher. You know, I received training  
11       through -- through voter protection, but.

12          Q.     And who -- who gave you the training for poll  
13       watching?

14          A.     Democratic Party of Georgia.

15          Q.     Okay. Apart from that, do you have any  
16       specific education or training with respect to election  
17       law?

18          A.     No.

19          Q.     Okay. And in that training that you received  
20       from the Democratic Party of Georgia, did they give you  
21       any election administration for Georgia or any other  
22       state, any training in election administration  
23       specifically?

24          A.     No.

25          Q.     Okay. And you said you were a poll watcher

1 or you were trained as a poll watcher. Did you -- Did  
2 you actually go and, you know, poll watch during  
3 elections?

4 A. Yes.

5 Q. What years would you say you've done that  
6 for?

7 A. It was the 2018 gubernatorial election and  
8 then there was another one after it, and it was  
9 probably 2019.

10 Q. Have you ever worked at a polling place as a  
11 poll worker?

12 A. No.

13 Q. Okay. When you were doing the poll watching  
14 for the 2018 and 2019 elections, were -- what poll --  
15 what poll places was that by county, let's say?

16 A. Cobb County.

17 Q. Cobb County. Okay. Do you happen to  
18 remember the precinct or did you do multiple precincts?

19 A. I did multiple. The first one was at the --  
20 I don't recall.

21 Q. Okay. That's fine. But you would say you  
22 did multiple precincts though?

23 A. Yes.

24 Q. Okay. Did the training that you received for  
25 your poll watching, did that include training in

1 casting absentee ballots?

2 A. Yes. The training did go over the absentee  
3 ballot requirements.

4 Q. Okay. And did that go -- When you say  
5 absentee ballots, in Georgia we call absentee voting --

6 A. Early voting.

7 Q. -- multiple types. So was it absentee by  
8 mail or absentee in person that the training covered,  
9 if you recall?

10 A. Well, absentee -- absentee in person is  
11 the -- is -- they call it early voting.

12 Q. Uh-huh.

13 A. They went over that. And they went over  
14 in-person voting too.

15 Q. Okay. Did they provide any training related  
16 to computers?

17 A. No.

18 Q. Okay. So nothing involving hardware or  
19 programming or cybersecurity or the voting equipment  
20 itself?

21 A. No.

22 Q. Do you have any training outside of the  
23 Democratic Party of Georgia's training that might have  
24 pertained to computers?

25 A. No.



1 Q. Okay. Just to be clear, you mentioned you  
2 worked at IBM. What did you do there?

3 A. I worked in -- I did a few things, mainly  
4 administrator professional working in the business  
5 partner support organization, support for contracts --  
6 business partner contracts and administered global  
7 contracts. Business partner -- They had to -- They had  
8 to have certification, and I tracked that. Then I  
9 moved over to the compliance area, and I participated  
10 in compliance meetings from business partners around  
11 the world. And then -- Let's see. I did lots of  
12 stuff. It's just mainly in the business partners  
13 support organization, supporting business partners.

14 Q. Okay. So they wouldn't have provided you  
15 with any computer-specific training at IBM in the  
16 course of your job there?

17 A. Oh, yeah, we received a lot of training with  
18 computers there.

19 Q. Okay. Can you describe that training?

20 A. Database training, how, you know, to operate  
21 computers, just -- I mean, probably just generally how  
22 companies train their employees on how to operate  
23 computers.

24 Q. Okay. Have you had any training or education  
25 concerning operation or functioning of the direct

1 recording electronic voting machines commonly referred  
2 to as DREs?

3 A. No.

4 Q. Okay. Have you had any training or education  
5 concerning the operation or functioning of ballot  
6 marking devices commonly referred to as BMDs?

7 A. No. I mean, I've heard about them and how  
8 they operate, but I haven't received any specific  
9 training.

10 Q. Okay. And any training or education  
11 concerning the operation or functioning of the scanners  
12 that are used in conjunction with BMDs during elections  
13 here in Georgia?

14 A. No.

15 Q. Have you ever voted on a DRE?

16 A. No.

17 Q. Have you ever voted on a BMD?

18 A. Yes. Oh, wait a minute. Wait a minute. I  
19 have voted on the DRE not the BMD.

20 Q. Okay. So the voting machines that were in  
21 place up until the recent --

22 A. Exactly.

23 Q. -- changeover?

24 A. Yes, yes, exactly.

25 Q. Okay.

1 related to election integrity and reform. What else?  
2 Just a lot of educating the public, you know, that  
3 I -- I normally -- I wouldn't have any idea even  
4 where to start if it weren't for CGG. They've been  
5 very helpful.

6 Q. Okay. Would you say that a goal of yours as  
7 a member is to help ensure that voting by paper ballots  
8 becomes a reality in Georgia?

9 A. I think voting by paper ballots is very  
10 important, yes.

11 Q. Okay.

12 A. Because of the paper trail.

13 Q. Right. Understood.

14 A. Yeah.

15 Q. Have you made any statements to the media  
16 in -- that relate to Georgia's voting laws?

17 A. Relates to Georgia voting laws. Let me think  
18 now. Well, when -- when there was an election, we were  
19 doing pictures of poll tapes. And Bill and I went to  
20 photograph some poll tapes, and I got out of the car  
21 and was photographing poll tapes. And while I was  
22 photographing the poll tapes, the election manager and  
23 the election workers -- voting was finished.

24 Q. Uh-huh.

25 A. And they were bringing the equipment out --

1 Their cars were parked on the opposite end of the  
2 parking lot, so they were bringing the election  
3 equipment out. And they left election equipment by the  
4 front door or right next to me. Nobody was there. And  
5 they were all getting in their cars. Nobody watched.  
6 I could have easily taken the -- Bill was parked right  
7 there waiting for me on the sidewalk. I could have  
8 taken the equipment, put it in the car, and driven off.  
9 It was pretty alarming. So I contacted -- I contacted  
10 the news, and they came.

11 Q. And when they came --

12 A. They --

13 Q. Oh, I'm sorry.

14 A. They did a report on that.

15 Q. Okay. Did you provide any quotes for them to  
16 use in any -- any media report that they did?

17 A. The -- The reporter pulled up a document that  
18 said that the poll workers, when they were done with --  
19 with their jobs, that they were supposed to be escorted  
20 by police officers, and they were not. So that was  
21 pretty concerning.

22 Q. And is that --

23 A. It's something Gabe Sterling published.

24 Q. And so did you -- And I'm sorry to, you know,  
25 harp on this, but I want to make sure. Was this

1 something that sort of you told the media and then they  
2 printed or aired that you're aware of?

3 A. Yes. CBS46, I think it was.

4 Q. Okay.

5 A. Giovanna Drpic was the --

6 Q. I'm sorry. What was that?

7 A. Giovanna Drpic was the newscaster --

8 Q. Okay.

9 A. -- CBS46.

10 Q. And this -- I assume that you reported this  
11 to the media. Did you report any of this to a -- any  
12 county or local or state election official?

13 A. Janine Eveler.

14 Q. And who's that?

15 A. She is the Cobb County Elections Director.

16 Q. Did she provide you with any response to the  
17 report?

18 A. They said they would investigate. I never  
19 heard back after that.

20 Q. Okay. And so you didn't report it to any  
21 state election official?

22 A. No. Since it was Cobb County, I provided  
23 Janine Eveler with the information.

24 Q. Okay. Any other -- Any other times that you  
25 spoke to the media about election-related topics?

1 A. Yes.

2 Q. Okay. What is your -- As a Plaintiff, what  
3 is your purpose in filing and proceeding with this  
4 litigation?

5 A. Well, to me, the machines aren't trustworthy.  
6 They're subject to being hacked and they're insecure.

7 Q. And based on your personal knowledge and  
8 understanding, what are the claims that you are  
9 currently making against the defendants in this  
10 lawsuit?

11 A. Well, it's on the Declarations. What  
12 specifically are you asking? I'm not sure what you're  
13 asking what my claims are.

14 Q. Well, if you have any specific claims that  
15 you are currently making against the defendants in this  
16 lawsuit, if you could describe them to me. Is it -- Is  
17 it -- And are they just related to your concerns about  
18 security of the machines?

19 A. No. I'm also concerned about absentee voting  
20 and, you know, how difficult that is sometimes. I  
21 would love to vote on the machines if I trusted them.

22 Q. Okay. Do you have any other claims that you  
23 plan on making in this case that have not yet been  
24 made?

25 A. No.

1 Q. Okay.

2 A. Just what's on the Declarations or

3 depositions, whatever they're called.

4 Q. Understood.

5 A. Declaration, yeah.

6 Q. Okay. You've voted in numerous elections; is  
7 that correct?

8 A. Yes.

9 Q. Do you have any evidence that any of the  
10 votes you have cast in any Georgia election were not  
11 counted?

12 A. I don't know how I would prove that.

13 Q. So you don't have any evidence then, is that  
14 safe to say?

15 A. No. No. And that's the problem.

16 Q. Okay.

17 A. We just don't know. We push the button and  
18 where does my vote go?

19 Q. Okay. Do you have any evidence that any DRE  
20 used in any election in Georgia has ever actually been  
21 hacked?

22 A. The same answer, how would -- how would I  
23 know that, you know, without a paper trail? The DREs  
24 give you a bar code. That's it.

25 Q. And just to be sure, I'm referring to the --

1 A. Yeah.

2 Q. -- DREs, yeah.

3 A. The DREs, I don't know how I would know that.

4 Q. Okay. Just to be clear then, so you don't  
5 have evidence that any DREs in any election in Georgia  
6 has ever actually been hacked.

7 A. Well, I'm pretty sure during the Mueller  
8 Report there was a lot of questions whether any of them  
9 were hacked or not.

10 Q. So you would refer us to the Mueller Report  
11 for any additional -- any response then to the question  
12 I previously posed?

13 A. I just -- I just don't know how you would  
14 prove that they haven't been hacked.

15 Q. Okay. So my question is not how to prove  
16 that they haven't been hacked. My question is if you  
17 have any evidence that any DRE used in any election in  
18 Georgia has actually been hacked.

19 A. Probably refer back to the Mueller Report.

20 Q. Beyond the Mueller Report, do you have any  
21 evidence that any DRE used in any election in Georgia  
22 has actually been hacked?

23 A. No.

24 Q. Okay. Do you have any evidence that any BMD  
25 used in any election in Georgia has been hacked?



1 A. No.

2 Q. Do you have any evidence that malware was  
3 inserted in any BMD during any election in Georgia in  
4 2019, 2020, or in any election since?

5 A. We don't know that. When Logan Lamb found  
6 everything open at KSU, there's a possibility.

7 Q. So I understand that, you know, you would  
8 take the position that there's a possibility that  
9 malware was inserted, but do you have any evidence that  
10 malware was actually inserted into any BMD used in an  
11 election in Georgia since 2019?

12 A. No.

13 Q. Okay. Thank you. I'm going to turn you back  
14 to the Exhibit Share. And I haven't uploaded it yet,  
15 so just give me a moment. Okay. It's taking a moment.  
16 It's a large file.

17 (Exhibit No. 3, Coalition for Good  
18 Governance's and Coalition Plaintiffs'  
19 Objections and Responses to Defendant Brad  
20 Raffensperger's First Request for Admission, was  
21 marked for identification purposes.)

22 BY MR. JACOUTOT:

23 Q. Okay. It should be on your end now. Let me  
24 know when you pull it up. It should be marked Exhibit  
25 0003.

1 any DRE voting machine used in any Georgia -- or excuse  
2 me. Let me rephrase that. I understand that you don't  
3 trust them, but do you have any evidence that any DRE  
4 voting machine used in the Georgia election was  
5 successfully hacked?

6 A. Well, I finally realized that when I pushed  
7 that button, I didn't know where my vote went.

8 Q. Okay.

9 A. I couldn't tell that it was counted as cast.

10 Q. Do you know how many times you've cast an  
11 absentee ballot?

12 A. I've casted an absentee ballot in every  
13 election that I've voted in since then.

14 Q. Okay. And you've never voted on a BMD; is  
15 that correct?

16 A. That's correct.

17 Q. And you do not have any plans to ever vote on  
18 a BMD in the future; is that correct?

19 A. That's correct.

20 Q. Okay. Now, I've asked you about whether  
21 you've been deposed before and whether you've been  
22 examined at trial. But have you -- Sort of apart from  
23 those questions, have you ever given any declarations  
24 in any case other than in this particular one?

25 A. No.

1 BY THE WITNESS:

2 A. Well, some of the machines weren't  
3 functioning. The pollbooks weren't functioning.

4 Q. Do you contend that -- So excuse me. Let me  
5 start over. So you said some of the machines and  
6 pollbooks malfunctioned; is that correct?

7 A. That's correct.

8 Q. Do you contend that the result of those  
9 malfunctions changed the election outcome in any way?

10 A. I don't know that.

11 Q. Do you have any evidence that any votes in  
12 the presidential election held on November 3, 2020, in  
13 Georgia were actually switched from President Donald J.  
14 Trump to Joseph R. Biden, Jr. as a result of the  
15 software anomaly in the election system?

16 A. Can you repeat that please?

17 Q. Yeah, absolutely. Do you have any evidence  
18 that any of the votes in the presidential election held  
19 on November 3, 2020, in Georgia were actually switched  
20 from President Donald J. Trump to Joseph R. Biden as  
21 the result of a software anomaly used in the election  
22 system?

23 A. Well, I have heard of people going to cast  
24 their votes and, when they pressed one, it switched to  
25 the other.

1 Q. Do you know who those people are?

2 A. I don't know them personally.

3 Q. Did they tell you directly or did you -- were  
4 you informed through someone else?

5 A. They told -- Well, I'm in a Facebook group,  
6 and they -- I was monitoring what was going on,  
7 especially during the -- was it the presidential? Was  
8 it the presidential election? And people were  
9 reporting that that happened to them.

10 Q. Did that happen to you?

11 A. No. Because I vote -- I vote -- I vote  
12 absentee.

13 Q. Okay. Just making sure. So the -- So you  
14 received information through a Facebook group that some  
15 people's votes were switched from Donald Trump to  
16 Joseph Biden?

17 A. Yes, in Cobb County.

18 Q. Do you remember the name of that Facebook  
19 group?

20 A. I don't.

21 Q. Okay. Do you have any evidence apart from  
22 the comments on the Facebook group that, during the  
23 presidential election held on November 3, 2020, that  
24 votes were actually switched from President -- excuse  
25 me -- from Joe Biden to Donald Trump?

1           A.     Some were switched. I don't know which  
2     was -- which to what.

3           Q.     Okay. Do you contend that this -- the -- and  
4     excuse me. Let me -- Let me rephrase. You said some  
5     were switched. How do you know that?

6           A.     They were posting. I was monitoring it. And  
7     Cobb County was having 11-hour wait times, and people  
8     were posting how long they were -- it was taking to  
9     vote. And some people were saying that their -- their  
10    votes were switched, and then they had the election  
11    manager come over and help them.

12          Q.     Okay. And to be clear, you don't remember  
13    the names of any of these people?

14          A.     I don't.

15          Q.     And these weren't reported directly to you.  
16    They just went to a Facebook --

17          A.     Exactly.

18          Q.     -- a public Facebook group.

19          A.     Exactly.

20          Q.     Okay.

21          A.     People were posting their experiences.

22          Q.     Gotcha. And do you have any evidence that  
23    these experiences being posted about vote switching  
24    were the result of an anomaly in the software used in  
25    the election system?

1 A. I have no opinion on that. I don't know.

2 Q. And so you don't have any evidence on that?

3 A. Other than what they said.

4 Q. Okay. And do you have any evidence that  
5 these alleged vote switchings reported in the Facebook  
6 groups were the results of an algorithm or other design  
7 feature of the election system?

8 A. I have no knowledge of that.

9 Q. Okay. And do you have any evidence that the  
10 alleged vote switching reported in the Facebook group  
11 was the result of any problem of any kind with any  
12 component of the election system?

13 A. I have no knowledge of that.

14 Q. Okay. And we talked about the presidential  
15 race, but do you -- did this -- do you have evidence  
16 that the votes in any other elections held on the  
17 ballot on November 3, 2020, were switched?

18 A. The 2018 gubernatorial election.

19 Q. I'm just referring to November 3, 2020.

20 A. Oh, no. Can you repeat that, please? I'm  
21 sorry.

22 Q. Sure. So the other allegations of vote  
23 switching that we just previously discussed involved  
24 the presidential election on November 3rd of 2020, the  
25 race for president. But my question is: Do you have

1 any evidence that any votes in any other election on  
2 the ballot on November 3, 2020, were actually switched?

3 A. No.

4 Q. Okay. Do you have any evidence of any  
5 widespread voter fraud in Georgia in connection with  
6 the elections held in Georgia on November 3, 2020?

7 A. No.

8 Q. Do you have any -- Excuse me. Do you have  
9 any evidence of any malfunctions of any component of  
10 the election system that impacted the outcome of the  
11 presidential election held in Georgia on November 3,  
12 2020?

13 A. I don't know.

14 Q. You don't know if you have any evidence or  
15 you don't have any evidence? I can rephrase the -- or  
16 repeat the question if it helps. Do you have any  
17 evidence of any malfunctions of any component of the  
18 election system that impacted the outcome of the  
19 presidential election in Georgia on November 3, 2020?

20 A. I don't know.

21 Q. Can you clarify whether you don't know if you  
22 have evidence or if you just -- or if you do not have  
23 evidence?

24 A. I don't have evidence.

25 Q. Okay. And so I'm going to ask the same

1 the end of it is, I don't know.

2 Q. So I know that you don't know whether illegal  
3 votes were counted. That's fine. But do you have any  
4 evidence that any illegal votes were counted in the  
5 November 3, 2020?

6 A. I have no evidence.

7 Q. Okay. And you're not contesting the outcome  
8 of the presidential election held in Georgia on  
9 November 2020; is that correct?

10 A. That's correct.

11 Q. And you're not contesting the outcome of any  
12 other elections held in Georgia on November 3, 2020; is  
13 that correct, and to clarify, any non-presidential  
14 elections held during that race -- or during the  
15 election on November 3, 2020?

16 A. No.

17 Q. Okay. Do you have any evidence that there  
18 was any mismatch between the QR codes on the paper  
19 ballots cast in the presidential election held in  
20 Georgia on November 3, 2020, and the human readable  
21 portion of the paper ballots?

22 A. How would I know that?

23 Q. So you don't have any evidence?

24 A. No.

25 Q. Okay.



## D I S C L O S U R E

I, Charlene M. Hansard, do hereby disclose pursuant to Article 10.B. of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia that I was contacted by the party taking the proceedings to provide court reporting services for this proceeding and there is no contract that is prohibited by O.C.G.A. Section 15-14-37(a) and (b) or Article 7.C. of the Rules and Regulations of the Board for the taking of this proceeding.

There is no contract to provide reporting services between myself or any person with whom I have a principal and agency relationship nor any attorney at law in this action, party to this action, party having a financial interest in this action, or agent for an attorney at law in this action, party to this action, or party having a financial interest in this action. Any and all financial arrangements beyond my usual and customary rates have been disclosed and offered to all parties.

DATED: September 23, 2021.



CHARLENE M. HANSARD, CCR-B-2341